

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

IN RE: VITAMINS ANTITRUST LITIGATION

MDL NO. 1285  
MISC. NO. 99-0197 (TFH)

THIS DOCUMENT RELATES TO:

**FILED**

ALL ACTIONS

APR 30 2001

NANCY MAYER WHITTINGTON, CLERK  
U.S. DISTRICT COURT

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Hogan  
4/30/01*

**STIPULATION AMONG PLAINTIFFS AND UCB, INC., UCB CHEMICALS  
CORPORATION, UCB PHARMA, INC., AND UCB FILMS, INC.**

In order to resolve a dispute among Plaintiffs, on the one hand, and UCB, Inc., UCB Chemicals Corporation, UCB Pharma, Inc., and UCB Films, Inc., on the other hand, concerning discovery Plaintiffs seek relating to their opposition to UCB S.A.'s motions to dismiss for lack of personal jurisdiction, these entities stipulate as follows:

1. Plaintiffs agree that UCB, Inc., UCB Chemicals Corporation, UCB Pharma, Inc., and UCB Films, Inc. shall have no further obligations to provide any discovery concerning their contacts with any of the forum states, except as expressly stated in Paragraph 6 below. This stipulation does not address Plaintiffs' ability to obtain discovery from these entities for other purposes, including the depositions of Mr. Denis and Mr. Kelly of UCB Chemicals Corporation.

2. For purposes of the above-captioned action only, UCB, Inc. hereby acknowledges that it is subject to jurisdiction in the following forums: the states of Arkansas, California, Georgia, Illinois, Indiana, Kansas, Minnesota, Missouri, Texas, and Virginia.

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3. For purposes of the above-captioned action only, UCB Chemicals Corporation acknowledges that it is subject to jurisdiction in the following forums and that, only for purposes of briefing and argument on UCB S.A.'s motions to dismiss for lack of personal jurisdiction, it may be deemed to be subject to jurisdiction in the following forums based on its transaction of business in such forums: the states of California, Georgia, Illinois, Indiana, Kansas, Minnesota, Missouri, Texas, and Virginia.

4. For purposes of the above-captioned action only, UCB Pharma, Inc. acknowledges that it is subject to jurisdiction in the following forums and that, only for purposes of briefing and argument on UCB S.A.'s motions to dismiss for lack of personal jurisdiction, it may be deemed to be subject to jurisdiction in the following forums based on its transaction of business in such forums: the states of Arkansas, California, Georgia, Illinois, Indiana, Minnesota, Missouri, Texas, and Virginia.

5. For purposes of the above-captioned action only, UCB Films, Inc. acknowledges that it is subject to jurisdiction in the following forums and that, only for purposes of briefing and argument on UCB S.A.'s motions to dismiss for lack of personal jurisdiction, it may be deemed to be subject to jurisdiction in the following forums based on its transaction of business in such forums: the states of California, Georgia, Illinois, Indiana, Kansas, Minnesota, Missouri, Texas, and Virginia.

6. This stipulation shall not impact or limit any obligation of UCB, Inc., UCB Chemicals Corp., UCB Pharma, Inc., or UCB Films, Inc. to provide discovery concerning their contacts with Washington, D.C. to the alleged choline chloride class plaintiffs in *Animal Science Products, Inc. v. Chinook Group, et al.*

7. Nothing in this stipulation is intended in any way to compromise, limit or prejudice jurisdictional discovery sought by any plaintiffs against any other defendants in MDL No. 1285.

Dated: April 23, 2001

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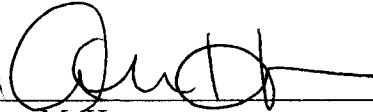
*UCB Pharma, Inc., and*

*UCB Films, Inc.*

*On behalf of all Plaintiffs that  
served Plaintiffs' Second Set of  
Interrogatories Related To Personal  
Jurisdiction Directed To UCB S.A.*

CERTIFICATE OF SERVICE

I hereby certify that this 23<sup>rd</sup> day of April, 2001, a true and correct copy of the foregoing Stipulation Among Plaintiffs and UCB, Inc., UCB Chemicals Corporation, UCB Pharma, Inc., and UCB Films, Inc. has been served on all counsel of record by electronic service pursuant to the Court's May 17, 2000 Order Regarding Electronic Service, utilizing Verilaw electronic service procedures.

A handwritten signature in black ink, appearing to read 'Ann M. Hart', is written over a horizontal line.

Ann M. Hart  
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